

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1  
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*Counsel to MP2 Energy LLC d/b/a  
Shell Energy Solutions*

In re:

CYXTERA TECHNOLOGIES, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-14853 (JKS)

(Jointly Administered)

**APPLICATION FOR ADMISSION *PRO HAC VICE***

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://www.kccllc.net/cyxtera>. The location of Debtor Cyxtera Technologies, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is: 2333 Ponce de Leon Boulevard, Ste. 900, Coral Gables, Florida 33134.

Boris I. Mankovetskiy, Esq. (“Movant”), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and a partner with Sills Cummis & Gross, P.C., hereby moves the Court for an order permitting Joseph E. Bain, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent interested party MP2 Energy LLC d/b/a Shell Energy Solutions (“Shell Energy Solutions”) pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **RELIEF REQEUSTED**

2. By this application, the Movant requests entry of an Order admitting Joseph E. Bain, Esq. (the “Applicant”) *pro hac vice*. The good standing of the Applicant is set forth in the Applicant’s accompanying certification (the “Certification”).

3. The Applicant is a partner with Jones Walker LLP, and maintains offices at 811 Main Street, Suite 2900, Houston, Texas 77002. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

4. It is anticipated that Applicant will be active in the representation of Shell Energy Solutions in the above-captioned cases. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of the Applicant and requests that the Applicant be permitted to appear on behalf of Shell Energy Solutions in connection with the above-captioned cases.

5. No previous application for the relief sought herein has been made to this or any other court in connection with these proceedings.

**WAIVER OF MEMORANDUM OF LAW**

6. The Movant respectfully requests that the Court waive the memorandum requirement as set forth in Local Bankruptcy Rule 9013-1. The Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Dated November 13, 2023

/s/ Boris Mankovetskiy, Esq.

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